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State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF ENVIRONMENTAL RESPONSE AND REMEDIATION

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ERRC-290-00

December 7, 2000

Jim Christiansen, RPM
US Environmental Protection Agency Region VIII
999 18th Street - Suite 300
Denver, Colorado 80202-2466

Re: Richardson Flat SAP Comments

Dear Mr. Christiansen:

Enclosed are our comments on the Richardson Flat Sampling and Analysis Plan. If you have any questions, please contact me at 801-536-4178.

Sincerely,

Muhammad A. Slam,
Project Manager - UDEQ

Enclosure

UDEQ COMMENTS ON THE DRAFT SAMPLING AND ANALYSIS PLAN SUMMIT COUNTY, UTAH

GENERAL COMMENTS:

1. It is our understanding that a meeting is scheduled to discuss the data needs for the ecological risk assessment. The data which will be collected for ecological risk assessment should also be included the sampling and analysis plan.
2. Information on the waste sources, pathways and receptors at the site should be used to develop a conceptual understanding of the site to evaluate potential risks to human health and the environment. The conceptual model should include known and suspected sources of contamination, types of contaminants and affected media, known and potential routes of migration, and known or potential human or environmental receptors. This effort, in addition to assisting in identifying locations where sampling is necessary, will also assist in the identification of potential remedial technologies.
3. We understand that a number of studies have been conducted at the Richardson Flat site and a significant amount of data has been collected in the past. However, it appears that in order to more fully characterize a proposed NPL-caliber site the sampling and analysis plan may need to be expanded to collect additional data for each pathway. For example, the SAP calls for drilling of two monitoring wells and collection of data from these two wells. Additional data are needed to more fully characterize this and other pathways and to conduct a risk assessment. The data collected will have to be of sufficient quality and quantity to support risk assessment.
4. All soil and sediment samples should be analyzed on a dry weight basis.
5. A State of Utah certified laboratory should be used for the analyses.
6. Please indicate if the ground water samples will be analyzed for total and/or dissolved metals.

SPECIFIC COMMENTS:

1. Page 2, Section 2.1

The UDEQ project manager for this site is Muhammad Slam. This should be corrected.

2. Page 4, Section 2.1

UDEQ oversight role should also be included in this section.

3. Page 5, Section 2.2, Second Paragraph

a. (EPA) is mentioned without first spelling out Environmental Protection Agency. This should be corrected.

b. This section should clarify that United Park has been implementing a series of remedial measure “on their own” without any oversight from UDEQ or EPA.

4. Page 5, Section 2.2, Third Paragraph

The first sentence may be simplified as follows: “United Park believes that under the current conditions this site poses little or no risk to public health or the environment.

5. Page 6, Section 2.2, Last Paragraph

“RI/FS final reports” should be changed to “final RI/FS report”.

6. Page 7, Section 2.2.1.1

This section should explain that the downstream silver creek zinc concentrations are lower than the upstream ones because the flow from diversion ditch may be causing dilution or the zinc is being absorbed/adsorbed on the sediments in the wetland area.

7. Page 11, Section 2.2.1.3 - Soil

Please clarify if all the tailings have been covered with clean soil. This comment also applies to first bullet in Section 2.2.2.

8. Page 11, Section 2.2.1.3 - Sediment

This section is numbered out of sequence. It should be re-numbered.

9. Page 13, Section 2.3, First Paragraph

Please clarify if the site is fenced on all sides.

10. Page 14, Section 2.4

This section and Table 1 describe the data quality objectives (DQOs). This discussion needs to be expanded and a step-by-step data quality objectives should be developed based upon EPA guidelines.

11. Page 14, Section 2.4

The end of first sentence should be changed to “remedial action” instead of “removal action”.

12. Page 18, Section 3.1.3

a. Please provide rationale for selecting 500 ppm for lead and 250 ppm for arsenic as screening values for further analysis. Also, include the list of RCRA metals described in this section. Usually total metals analysis is conducted to determine the need for possible on-site remediation.

b. Please list the number of locations which will be excavated to determine the thickness of cover. Also, these locations should be shown on a map.

13. Page 19, Section 3.1.5

In second line “ling term” should be changed to “long term”.

14. Page 26, Section 3.5

If field equipment is decontaminated on site as part of the sampling process, equipment blanks should be collected.

15. Page 27, Section 4.1

UDEQ should also be mentioned as receiving the deliverables.

16. Page 28, Section 5.2

EPA’s functional guidelines for evaluating inorganic data (EPA-540/R-94-013, February 1994) and for organic data (EPA-540/R-94/012, February 1993) should be consulted for data validation.